

## 1. PROVIDER CHOICE COMMITMENT TO PRIVACY

Provider Choice is committed to managing personal information in accordance with the Australian Privacy Principles under the *Privacy Act 1988* (Cth) (Privacy Act) and in accordance with other applicable privacy laws (see below for further information about Provider Choice).

We understand the importance of being open and transparent with you in the way in which we collect, hold, store, use and share your personal information. We take protecting your privacy very seriously.

We strongly encourage you to read this document, so that you understand and are comfortable with how we handle your personal information. If you have any questions about this document, or about Provider Choice's handling of your personal information, please contact us using the relevant contact details set out in *section 16*.

This document sets out our policies for managing your personal information and is referred to as our Privacy Policy. It sets out how we collect, store, process, use and disclose personal information (including personal information we collect, and personal information submitted to us, whether offline or online).

## 2. ABOUT PROVIDER CHOICE

Provider Choice Plan Management Pty Ltd (ACN 627 164 194) (Provider Choice, we, our, us) is a health tech company that provides NDIS plan management services and Provider Choice tools to help people living with disability and long term health needs.

As a Participant you should think of a plan manager as your personal NDIS bookkeeper and guide. Plan managers sort the invoicing hassle out for you, pay your service providers on your behalf, and help you budget your funding.

[Provider Choice is a part of the T-Shirt Ventures Group, which also includes Australian Ability Enterprises Pty Ltd ABN 14 629 635 552 operating as T-Shirt Ventures, HeyHubble Pty Ltd ABN 42 641 312 594 and T-shirt Services Pty Ltd ABN 63 642 149 424.]

## 3. DEFINITIONS

Health Information means all personal information collected when providing a health service and includes:

- information or an opinion about:
  - o a person's health (including an illness, disability or injury);
  - o a person's expressed wishes about the future provision of their health services;
  - o a health service provided, or to be provided, to a person that is personal information; and
- other personal information collected to provide, or in providing a health service to a person.

HeyHubble is an NDIS marketplace that connects Participants with quality service providers who match their specific needs.

Job Applicant means any people who apply to work at The T-shirt Ventures Group, including to gain work experience.

Minor means any person under 18 years old.

NDIS means the National Disability Insurance Scheme under the NDIS Act and any codes of conduct, standards and rules and regulations made pursuant to the NDIS Act.

NDIS Act means the *National Disability Insurance Scheme Act 2013* (Cth).

Nominee means a person who has been nominated to act on behalf of, or make decisions on behalf of a Participant.

Participant has the meaning given in the NDIS Act.

Personal Information is defined in the Privacy Act, and means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

Platform means the Provider Choice website that Participants can log onto to receive Provider Choice services.

Sensitive Information means personal information that includes information or an opinion about an individual's:

- racial or ethnic origin
- political opinions or associations
- religious or philosophical beliefs
- trade union membership or associations
- sexual orientation or practices
- criminal record
- health or genetic information
- some aspects of biometric information.

T-shirt Ventures Group means Provider Choice, Australian Ability Enterprises Pty Ltd ABN 14 629 635 552, HeyHubble Pty Ltd ABN 42 641 312 594 and T-shirt Services Pty Ltd ABN 63 642 149 424.

#### 4. WHAT INFORMATION DO WE COLLECT ABOUT YOU AND HOW DO WE COLLECT THIS INFORMATION?

Normally we collect your personal information from you directly, however on occasion, we may also collect personal information about you from other people and organisations.

In summary, we may collect your personal information when you:

- create an online Provider Choice account with us;
- use the Provider Choice Platform, plan management services or online tools;

- provide Provider Choice services as a Service Provider or other third party services provider;
- interact with us via phone, email, SMS, social applications (such as LinkedIn, Facebook or Twitter);
- interact with our website, social applications, services, content and advertising;
- invest in our business or enquire as to a potential purchase in our business; and
- apply for a position with us (including for work experience).

We may also collect your information from:

- your Nominee when they sign you up to receive our products and services;
- your Service Provider or other healthcare providers;
- another member of the T-Shirt Ventures Group; and
- other third parties (such as through referees).

### Summary of personal information we collect and how we collect this information

The types of personal information that we collect and how we collect this personal information will depend on who you are and how we are interacting with you. Typically this includes the following:

Type of personal information	What this includes	How do we collect this information?
Participant		
Generally speaking because of the nature of the services we provide to you, all of the Personal Information we collect about you is considered Health Information for the purpose of the Privacy Act		
Personal Information and contact details	This may include you: <ul style="list-style-type: none"> <li>• full name;</li> <li>• pronouns;</li> <li>• date of birth;</li> <li>• phone number</li> <li>• address;</li> <li>• email address.</li> </ul>	We may collect this information: <ul style="list-style-type: none"> <li>• when you or your Nominee sign up to receive our plan management services or access to Provider Choice tools; and</li> <li>• when we provide you with our services or access to Provider Choice tools.</li> </ul>
Health Information and other sensitive information	This may include information about: <ul style="list-style-type: none"> <li>• the type of service you are seeking (e.g. whether you are seeking to receive Provider Choice plan management services, create a Provider Choice account or access free Provider Choice tools;</li> <li>• NDIS number;</li> <li>• NDIS plan and budget;</li> </ul>	We may collect this information: <ul style="list-style-type: none"> <li>• when you or your Nominee sign up to receive our plan management services or access to Provider Choice tools; and</li> <li>• when we provide you with our services or access to Provider Choice tools;</li> <li>• when we request further information from you or your Nominee in order to</li> </ul>

Type of personal information	What this includes	How do we collect this information?
	<ul style="list-style-type: none"> <li>• NDIS plan start date and end date;</li> <li>• primary disability and other health information which is provided to us; and</li> </ul> [racial background, ethnicity, languages spoken, sexual orientation and other sensitive information].	<p>continue providing you with Provider Choice services.</p> <p>Not all of this information is required to receive our services and you can generally choose what information you provide to us. The collection of some of this information helps us provide a more tailored and personalised service to you, when you choose to provide it to us.</p>
Financial information	<p>This may include your:</p> <ul style="list-style-type: none"> <li>• bank account details; or</li> <li>• credit card information.</li> </ul>	We may collect this information when you pay for Provider Choice services.
Information collected through surveillance	<p>This may include your:</p> <ul style="list-style-type: none"> <li>• Email surveillance</li> </ul>	We currently don't collect information through surveillance, however we do monitor emails from a data security perspective to prevent harmful messages
Nominee		
Personal Information and contact details	<p>This may include your:</p> <ul style="list-style-type: none"> <li>• full name;</li> <li>• phone number;</li> <li>• postcode; and</li> <li>• email address.</li> </ul>	<p>We may collect this information:</p> <ul style="list-style-type: none"> <li>• when you sign a Participant up to receive our plan management services or access to Provider Choice tools; and</li> <li>• when we provide your Participant with our services or access to Provider Choice tools.</li> </ul>
Financial information	<p>This may include your:</p> <ul style="list-style-type: none"> <li>• bank account details; or</li> <li>• credit card information.</li> </ul>	We may collect this information when you pay for Provider Choice services.
Service Provider		
Personal information and contact details	<p>This may include your:</p> <ul style="list-style-type: none"> <li>• full name;</li> <li>• phone number;</li> <li>• postcode; and</li> <li>• email address.</li> </ul>	We may collect this information when you provide services to us or otherwise to manage our relationship with you.

Type of personal information	What this includes	How do we collect this information?
Personnel (staff who work for us)		
Personal Information and contact details	<p>This may include your:</p> <ul style="list-style-type: none"> <li>• full name;</li> <li>• pronouns;</li> <li>• date of birth;</li> <li>• phone number / Emergency contact details</li> <li>• address; and</li> <li>• email address.</li> <li>• Copies of Passports</li> </ul>	We will collect this information if you work for Provider Choice.
Workplace information including	<p>This may include:</p> <ul style="list-style-type: none"> <li>• information relating to your work history;</li> <li>• information about your education and qualifications;</li> <li>• Worker's Screening Check;</li> <li>• your working eligibility rights;</li> <li>• your suitability for the role you are applying for;</li> <li>• details about your referees; and</li> <li>• health and sensitive information in certain circumstances.</li> </ul>	We collect this information if you work for Provider Choice.
Financial Information	<p>This may include your:</p> <ul style="list-style-type: none"> <li>• bank account details; and</li> <li>• Tax Information</li> </ul>	We may collect this information in order to pay you.
CCTV Footage	We may collect camera surveillance information which includes photographs or video recordings of you.	We may collect this information in circumstances where we use camera surveillance (e.g. CCTV) at our premises for safety and security purposes.
Information required to be collected by law	We may collect information as required by law.	We may collect this as required.
Publicly available online information	We may collect information that is publicly available	We may collect this directly from the publicly available source (e.g. on

Type of personal information	What this includes	How do we collect this information?
	online, such as on online forums, websites, and social media channels (for example, information that relates to a complaint).	the online forum, website, or social media channel).
Job Applicants		
Workplace information	<p>This may include:</p> <ul style="list-style-type: none"> <li>• full name;</li> <li>• pronouns;</li> <li>• phone number;</li> <li>• email address;</li> <li>• information relating to your work history;</li> <li>• information about your education and qualifications;</li> <li>• your working eligibility rights;</li> <li>• your suitability for the role you are applying for; and</li> </ul> <p>details about your referees.</p>	We may collect this information if you apply for a position at Provider Choice (including if you are applying for work experience with us).
Publicly available online information	We may collect information that is publicly available online, such as on online forums, websites, and social media channels (for example, information that relates to a complaint).	We may collect this directly from the publicly available source (e.g. on the online forum, website, or social media channel) for the purpose of the recruitment process.

## 5. PROVIDING INFORMATION FOR SOMEONE ELSE

If you are providing personal and/or sensitive information on behalf of someone else (for example you are a Nominee, Support Coordinator, emergency contact or a job referee), you must have the consent of that person to provide their personal and/or sensitive information to us to be collected, used and disclosed in accordance with this Privacy Policy. You should also let them know about our Privacy Policy (including the information in this Privacy Policy). We may request evidence of this consent.

If you are providing personal and/or sensitive information on behalf of a Minor, you must be that Minor's parent or legal guardian and you must provide consent for the Minor's personal and/or sensitive information to be collected, used and disclosed in accordance with this privacy policy.

## 6. CAN YOU DEAL WITH US WITHOUT PROVIDING YOUR NAME?

Most of the time, we will need your real name as it may not be practicable for us to deal with you anonymously or pseudonymously on an ongoing basis. For example, this includes when providing you with our Provider Choice services. This means that if we do not collect your personal information, we may not be able to provide you with the products and/or services you have asked for.

In some circumstances you may have the option of not providing your name, or using a fake name, when you deal with us (where it is lawful and practicable). This includes for example, when you make a general enquiry via phone or our website.

## 7. WHY DO WE COLLECT, STORE AND USE YOUR PERSONAL INFORMATION?

We collect personal information that is necessary to provide you with our products and services, and to carry out our business.

We may use your personal information for purposes which are incidental to the sale and promotion of our goods and services, or for other purposes which are within your reasonable expectation or permitted by law.

The purpose for which we usually collect, store, and use your personal information depends on how you interact with us (for example, whether you are Participant, Nominee, Job Applicant or Service Provider), but may include the following purposes:

Purpose	Explanation
To provide you with information and our products, tools and services including plan management services	<p>We're a national plan manager that has dedicated NDIS plan managers providing a personal experience for Participants. In order to provide a personal experience for Participants we may collect, store and use your personal information to:</p> <ul style="list-style-type: none"><li>• understand your personal story and needs;</li><li>• give expert advice tailored for your plan;</li><li>• ensure you're getting the most out of your funding;</li><li>• explain what exactly can be bought;</li><li>• make the NDIS experience less overwhelming for you;</li><li>• confirm your identity to us;</li><li>• provide you with electronic confirmation of your services you have requested and advise you of any changes to these services; and</li><li>• send you administrative messages, reminders, notices updates, security alerts in relation to the specific services we provide to you.</li></ul>
To provide you with marketing and educational content	<p>We may send you marketing and promotional messages and other information that may be of interest to you and for the purpose of direct marketing (in accordance with the Spam Act).</p> <p>See <i>section 10</i> for information on how we send you direct marketing communications and how you can opt out of these communications.</p>

Purpose	Explanation
To manage your working relationship with us (including when you are a contractor)	<p>We may collect, store and use your personal information to assess your suitability for a position with us, and, if you successfully join us, to manage our working relationship with us.</p> <p>We may collect, store and use your personal information for administration and management purposes.</p>
To do business with you	We may collect, store and use your personal information about you if you interact with us on a commercial basis (such as if you are a service provider, contractor or supplier to us), or you otherwise interact with us on a commercial basis.
To manage and improve our operations and business	<p>We may collect, store and use your personal information to:</p> <ul style="list-style-type: none"> <li>• manage fees and administer billing (including third-party payment arrangements) and debt recovery;</li> <li>• process payments, provide refunds or discounts;</li> <li>• manage, monitor, plan and evaluate our products and services;</li> <li>• conduct safety and quality assurance and improvement activities, including quality control of our products, services and communications with you;</li> <li>• consider an application of employment from you;</li> <li>• train staff (including sales and plan management staff);</li> <li>• test and maintain information technology systems;</li> <li>• investigate any incidents that may occur (both in relation to cyber security, as well as any health and safety incidents that occur at our premises);</li> <li>• handle and respond to any complaints made; and/or</li> <li>• assist with product and service development, to test the effectiveness and customer and Participant satisfaction of our products and services, improve the way we provide products and services to you, and for other quality assurance and compliance purposes.</li> </ul>
To create deidentified or aggregate data for data analytics activities	<p>We may collect, store and use your personal information to create deidentified or aggregate data sets (which is no longer personal information). We do this by deidentifying or aggregating your information such as combining your information with information we have about our other individuals, for example purchasing information, and with data we obtain from other sources. We use this deidentified or aggregate data to assist with our business decisions, such as to:</p> <ul style="list-style-type: none"> <li>• help us in understanding trends in Participant and other individual behaviour (such as the success of our products and services);</li> <li>• improve the products, tools and services we offer; and</li> <li>• develop new products, tools and services that better meet the needs of individuals we deal with based on preferences and behaviours.</li> </ul>



## 8. WHO DO WE SHARE YOUR PERSONAL INFORMATION TO AND WHY?

We may share your information with third parties:

- for the reasons for which we collect, store and use that information (see above in *section 6*);
- for other purposes explained at the time we collect your personal information; or
- where we are otherwise allowed or required to do so under law.

Some of the third parties we may share your information with include the following:

Recipient	Explanation
Other members of the T-Shirt Ventures Group	We may share your personal information across the T-Shirt Ventures Group, between members of the group (as appropriate).
Our contractors, suppliers and other entities we do business with	<p>We may share your personal information with our partners and other entities we do business with to assist in providing our products and services to you.</p> <p>The kinds of third parties to whom we may disclose personal information to include delivery services providers, manufacturers, suppliers and distributors.</p>
Our service providers	<p>We may share your personal information with a variety of our service providers to assist us with providing, promoting, and managing our products and services. This includes Service Providers and may also include other third party service providers including our:</p> <ul style="list-style-type: none"><li>• third party storage providers;</li><li>• software providers; and</li><li>• professional advisors and consultants (such as legal, insurance and financial advisors).</li></ul>
Government and law enforcement agencies	We may share your personal information with the NDIA, and other regulatory bodies, government agencies and law enforcement bodies to comply with our legislative or regulatory obligations (such as to assist with police investigations).

## 9. DO WE SHARE YOUR PERSONAL INFORMATION OVERSEAS?

We generally collect your personal information in Australia. However, it is likely that we will share your personal information with overseas recipients located in New Zealand and the Philippines. These recipients include our service providers who may handle, process or store your personal information on our behalf.

For example, we may share your personal information with service providers who assist us with storing our data on secure data storage servers, or with improving our products and services (by analysing information and trends)

We only ever share your personal information outside of Australia where we are permitted to do so under the Privacy Act. Generally this means we will take reasonable steps to ensure your personal information is treated securely and in accordance with applicable privacy laws.

There are other circumstances where we may disclose your personal information to an overseas recipient. For example, where you have provided your consent or we are otherwise permitted to do so under other relevant laws.

## 10. DO WE USE OR SHARE YOUR PERSONAL INFORMATION FOR DIRECT MARKETING?

When you provide your personal information to Provider Choice, we may use that personal information to send you direct marketing communications including carefully selected news, marketing and educational content about Provider Choice, HeyHubble and the NDIS generally.

We may communicate with you (and send these electronic messages and tailored advertising) through various channels, such as via regular mail, email, SMS, telephone, push notifications or social media (including through targeted advertisements on certain websites and social media channels).

We will only send these communications in accordance with applicable privacy and marketing laws (such as the Privacy Act (including Australian Privacy Principle 7) and the *Spam Act 2003* (Cth)), and only where you have not opted out from receiving such communications from the Provider Choice.

If you have indicated a preference for a method of communication, we will endeavour to use that method wherever practical to do so.

### *How can you opt out?*

You are always in control of the direct marketing communications which you receive and can opt-out at any time. Generally you can opt-out by following the relevant opt-out or unsubscribe instructions in the relevant communication (such as email or SMS message).

You can also contact us using the detail set out in *section 16* to tell us you would like to stop receiving direct marketing communications from us.

### *Important points regarding opting out*

Importantly:

- if you are a customer of multiple T-Shirt Ventures Group products and services (for example you receive services from Provider Choice and also from HeyHubble), even if you opt out from receiving direct marketing communications from Provider Choice, this will not mean you are opted out from receiving direct marketing communications from HeyHubble; and
- regardless of whether you opt out from receiving any or all direct marketing communications, we will still communicate with you if we are required by law to provide you with information, or in relation to the services or products we are providing you with (for example, in relation to the management of your NDIS plan).

## 11. HOW DO WE INTERACT WITH YOU VIA THE INTERNET?

### *Third party links and sites*

When you use our websites or receive communications from us, links to websites which belong to other third parties may be included (and are provided for your convenience). You should make your own enquiries as to the privacy policies of these parties. We are not responsible for information on, or the privacy practices of, any third party websites.

### *Website use*

You may visit our websites without identifying yourself. If you identify yourself (for example, by creating an online account or making an enquiry), any personal information you provide to us will be managed in accordance with this Privacy Policy.

## 12. HOW DO WE STORE AND PROTECT YOUR PERSONAL INFORMATION?

We are committed to protecting your personal information, and ensuring that we securely store any personal information we collect (and in accordance with applicable privacy laws). We may hold your personal information in hard copy (paper) or electronic form.

We take all reasonable steps to ensure that any personal information we collect, use or disclose is accurate, complete, up-to-date and stored in a secure environment protected from misuse, interference and loss, and from unauthorised access, modification or disclosure.

### *Security and storage of personal information*

Form	Explanation
Paper-based files	<p>We store personal information in paper-based files in secure storage (generally at our office in Sydney and Perth). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed).</p> <p>We maintain physical security measures to ensure that personal information in paper-based files is protected, such as physical locks and security systems at our premises.</p>
Electronic records	<p>We store electronic records in secure databases, using trusted third party storage providers based in Australia. We also maintain physical security measures in relation to storage of our electronic records (such as through locks and security systems at our electronic data stores).</p> <p>Using technical methods, we also maintain computer and network security. For example, we use firewalls (security measures for the internet) and other security systems such as email protection</p>

software, user identifiers and passwords to control access to our computer systems.

#### How long do we keep your personal information?

We will only keep your personal information we store for as long as is necessary for the purposes set out in this Privacy Policy or as required to comply with any applicable legal obligations.

When we no longer require your personal information (and in accordance with any applicable laws), we will take steps to delete, destroy or de-identify that information.

### 13. HOW CAN YOU ACCESS OR SEEK CORRECTION OF YOUR PERSONAL INFORMATION?

You are entitled to request access to any of your personal information that we have. To make such a request, please contact us using the relevant contact details set out below in *section 16*.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and informing us of any change in your personal details (for example, if your email address changes or if you move and change address).

If you consider any personal information we have about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, you are also entitled to request correction of the information (again, please contact us). After receiving a request from you, we will take reasonable steps to correct your information.

We may decline your request to access or correct your information in certain circumstances in accordance with the applicable privacy laws. If we do refuse your request, we will provide you with a reason for our decision. In addition, in the case we refuse your request for correction, we will include a statement about your request with the personal information we store.

### 14. HOW CAN YOU MAKE A COMPLAINT ABOUT THE HANDLING OF YOUR PERSONAL INFORMATION?

If you have any questions or concerns about this Privacy Policy or how we have handled your personal information, you may contact us at any time using the relevant contact details set out below in *section 16*.

Please also contact us if you have a complaint about privacy. If you make a complaint about privacy, the following will occur:

No.	Step
1.	We will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.
2.	If your complaint requires more detailed consideration or investigation:

	<ul style="list-style-type: none"> <li>• we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly; and</li> <li>• we may ask you to provide further information about your complaint and the outcome you are seeking.</li> </ul>
3.	We will then typically gather relevant facts, locate and review relevant documents and speak with the individuals involved.
4.	In most cases, we will respond to your complaint within 30 business days from when we receive your complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to a complaint, or you consider that we may have breached the Privacy Act (including the Australian Privacy Principles), you are entitled to make a complaint to the Office of the Australian Information Commissioner (the Australian privacy regulator).

The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992, or you can fill out this [form](#) to make a complaint about our handling of your personal information. Full contact details for the Office of the Australian Information Commissioner can be found online at [www.oaic.gov.au](http://www.oaic.gov.au).

## 15. HOW ARE CHANGES ARE MADE TO THIS PRIVACY POLICY?

We may make changes to this Privacy Policy, with or without notice to you. However, where we make a material change to the Privacy Policy, we will provide notice to you (including by updating our websites, and, where appropriate, notifying you directly). We recommend you visit this Privacy Policy regularly to keep you up to date with any changes we make.

## 16. HOW CAN YOU CONTACT US?

You can contact us using the details below:

PROVIDER CHOICE	
Phone	1300 776 246
	You can contact us 9am to 5pm, Monday to Friday AEST
Email	hello@tshirtventures.com.au
Postal address	276 Devonshire Street, Surry Hills, NSW